

## GSA POLICY AND PROCEDURE

SUBJECT: GSA Workforce Learning and Development Policy

1. Purpose. The purpose of this policy is to:

- a. Provide a framework for workforce learning and development at GSA, the specific procedures for which shall be developed by the Office of Human Resources Management (OHRM) in conjunction with its internal business partners.
- b. Establish policy and identify roles and responsibilities regarding GSA learning and development programs and opportunities.
- c. Establish policy and assign responsibilities regarding the purpose, development, and maintenance of GSA employees' Individual Development Plans (IDPs), and Executive Development Plans (EDPs) for GSA senior executives.
- d. Identify the legal foundations for the learning and development policy and establish procedures and assign responsibilities for implementing learning and development programs for GSA employees.
- e. Refer to supplement instructions and guidelines found in the Office of Personnel Management (OPM) Training Policy Handbook: Authorities and Guidelines, May 11, 2007, Title 5, Code of Federal Regulations (CFR) Part 410 and 5 CFR Part 412.

2. Cancellations. This policy cancels the following documents:

- a. OAD P 9410.1 Employee Development and Training Handbook, dated May 3, 1994.
- b. ADM P 9920.1 Senior Executive Service, Chapter 9, Incumbent Development Program, dated August 26, 1991.
- c. Memorandum for Vickie L. Jones, "Updated Policy on Payment for Professional Credentials and Certification using GSA Funds," signed by Douglas A. Glenn, dated January 5, 2010.
- d. PBS guidance letter titled "PBS Training and Development Program," signed by Donna Dix, dated August 17, 2012.

### 3. Applicability and Scope.

#### a. This policy applies to:

- (1) All GSA employees except those otherwise excluded from training under this policy or by Federal regulation or statute.
- (2) Federal employees working at GSA on rotation or detail from other agencies, subject to the terms of the appropriate Interagency Agreement.
- (3) Non-GSA employees under contract to GSA ("contractors") under limited circumstances. (See Section 8 below.)

#### b. This policy does not apply to:

- (1) Employee activities unrelated to the identified roles, responsibilities, and duties of a GSA employee.
- (2) The Office of Inspector General (OIG) has independent personnel authority. See Section 6 of the Inspector General Act of 1978, (5 U.S.C. App.3), as amended (Inspector General is authorized "to select, appoint, and employ such officers and employees as may be necessary for carrying out the functions, powers and duties of the Office of Inspector General") and GSA Order ADM P 5450.39D GSA Delegations of Authority Manual (Delegations Manual), Chapter 2, Part 1 ("the Inspector General has independent authority to formulate policies and make determinations concerning human capital issues within the [OIG]" and GSA determinations/delegations do not limit that authority). Similarly, GSA specifically recognizes that the Inspector General has independent authority to formulate policies and make determinations concerning training, employee development and career management. ADM P 5450.39D, Delegations Manual, Chapter 7, Part 1. The OIG in setting its own training policy will consider the GSA Order, to the extent that it does not infringe on the Inspector General's independent personnel authority and does not conflict with other OIG policies.

#### c. Implementation action:

- (1) Implementation of this policy as it affects employees represented by a labor bargaining unit is contingent upon completion of labor relations obligations.

4. Signature.

---

ANTHONY E. COSTA  
Chief Human Capital Officer  
Office of Human Resources Management

---

Date

# HRM P 9410.1A GSA Workforce Learning and Development Policy

## Table of Contents

<u>Sections</u>	<u>Page</u>
1. <a href="#">Introduction</a> .....	<a href="#">1</a>
2. <a href="#">Objectives</a> .....	<a href="#">2</a>
3. <a href="#">Types of Learning and Development</a> .....	<a href="#">3</a>
4. <a href="#">GSA Annual Learning and Development Cycle</a> .....	<a href="#">4</a>
5. <a href="#">Measures and Metrics</a> .....	<a href="#">5</a>
6. <a href="#">Individual Development Plans (IDPs)</a> .....	<a href="#">5</a>
7. <a href="#">Eligibility for GSA Learning and Development Programs</a> .....	<a href="#">9</a>
8. <a href="#">Contractor Eligibility for Learning and Development Programs</a> .....	<a href="#">10</a>
9. <a href="#">Payment of Training Expenses; Qualifications for Reimbursement; Taxes</a> .....	<a href="#">10</a>
10. <a href="#">Membership in Professional Associations</a> .....	<a href="#">15</a>
11. <a href="#">Obligations for Participation in GSA Learning and Development Programs</a> .....	<a href="#">15</a>
12. <a href="#">Career Transitional Assistance</a> .....	<a href="#">17</a>
13. <a href="#">Educational Assistance Programs (Tuition Assistance)</a> .....	<a href="#">17</a>
14. <a href="#">Conferences</a> .....	<a href="#">18</a>
15. <a href="#">Minimizing Training Costs; Avoiding Redundancy</a> .....	<a href="#">18</a>
16. <a href="#">Training Reports and Record Keeping</a> .....	<a href="#">19</a>
 <u>Appendixes</u>	
<a href="#">Appendix A: Definitions</a> .....	<a href="#">A-1</a>
<a href="#">Appendix B: References</a> .....	<a href="#">B-1</a>

## 1. INTRODUCTION

a. GSA is committed to attracting, retaining, and developing a high performance workforce through skills training, education, and professional development, consistent with our Human Capital Strategic Plan. We increase our efficiency and productivity when employees have the knowledge and skills to succeed. The complexity and scope of our mission require continual upgrading of competencies to perform in a dynamic work environment.

b. GSA's mission is to increase the efficiency and effectiveness of federal operations, in part by reducing the operating cost of federal government. Therefore, GSA should set the standard for federal training efficiency. To meet this objective, GSA employees shall first seek out suitable no-cost and low-cost learning and development options before undertaking more expensive options. In particular, GSA employees shall avoid or minimize travel expenses and enrollment fees when viable options are available.

c. The GSA Office of Human Resources Management (OHRM) is the policy-setting organization governing GSA workforce learning and development. This policy supersedes prior OHRM policies and any other GSA policy with conflicting provisions.

(1) The OHRM, jointly with the Office of the Chief Financial Officer (OCFO), shall annually establish an agency-wide learning and development budget, and determine its allocation.

d. Within OHRM, the Chief Learning Officer (CLO) is a center of expertise resource to aid GSA internal business partners in obtaining the highest return on GSA learning and development investment. To that end, the CLO drafts learning and development policy; designs, delivers and oversees enterprise training; and designs and oversees learning and development metrics. The CLO establishes GSA's annual learning and development cycle, which defines how the agency: budgets funds; identifies and prioritizes needs; measures the effectiveness of programs and initiatives; revises programs in place; and translates learning and development data into actionable workforce planning initiatives.

e. The GSA Learning and Development Council (LDC) shall evaluate formal leadership development programs, both internal and external to GSA, and determine which programs best meet GSA's strategic leadership development needs.

(1) From a funding pool set jointly by OHRM and OCFO, the LDC will allocate funding for the slate of programs, providing funding in part or whole for GSA employees to participate in each.

(2) The LDC shall establish internal application and nomination procedures for the slate of programs. The LDC shall be empowered to establish and delegate authority to subcommittees to review and recommend programs, procedures, and funding levels.

(3) The composition of the LDC shall be determined by OHRM, and will generally consist of senior agency leaders and key subject matter experts, including the CLO.

f. GSA managers and supervisors are responsible for linking training expenditures and efforts to organizational strategy, mission, and vision. This is part of a new emphasis (explained more fully in Section 4 of this policy) on being deliberate and active about using training to advance agency strategic goals. To achieve this objective, OHRM will provide guidance and assistance at every level of the agency:

(1) Supervisors will assess and define work-unit and individual training needs in terms of organizational strategies, and will be able to explain how training advances those strategies. Supervisors will thus develop work-unit development plans.

(2) Work-unit development plans will roll up into development plans for branches and divisions.

(3) In turn, division plans will roll up into organizational development plans for their respective Services and Staff Offices. OHRM will review these S&SO assessments and justifications and guide business partners in strengthening these links and improving results.

## **2. OBJECTIVES**

a. To satisfy the learning and development requirements of GSA internal business partners, GSA's Learning and Development Policy provides that:

(1) All employees shall have access to training, learning, and developmental opportunities to maintain and improve skills and competencies required to perform their job duties successfully, and to grow in their professions;

(2) The agency shall develop employees to fulfill succession and diversity planning requirements at all levels within GSA;

(3) OHRM will support internal GSA business partners by:

(a) Helping them assess their learning and development needs;

(b) Evaluating the effectiveness of existing programs in achieving their goals and in advancing GSA strategic goals;

(c) Providing viable and efficient training choices; and

(d) Ensuring compliance with this policy through oversight and audits of GSA learning and development activities.

(4) GSA provides stakeholder oversight organizations, such as OPM, with timely and accurate information regarding the continued development and competence of the GSA workforce.

### **3. TYPES OF LEARNING AND DEVELOPMENT**

a. GSA's training framework envisions three categories of learning and development activities. The OHRM expects to reduce redundancy and cost by evaluating and approving training expenditures through this framework. Two categories consist of enterprise-wide activities, which exclusively or chiefly fall under the purview of the CLO, except as noted in Section 3(a)(1)(c), below. The third category's narrower focus places its activities under the purview of the activity owners, with OHRM in an advisory and oversight role. The three categories of activities are:

(1) Enterprise mandatory training.

(a) This is training that all GSA employees (or all employees of a type, such as supervisors, without regard to their business role) need. Enterprise mandatory training, except as noted in (c) below, is delivered primarily by electronic means, and shall be conducted, tracked, and assessed through a single portal.

(i) Examples: training required for federal employees by statute, regulation, or policy; security awareness training; and supervisory training.

(b) Except as noted in (c) below, the CLO will maintain primary responsibility across the agency for needs assessment, design and delivery, and measuring of enterprise training.

(c) OGC will maintain responsibility for developing, delivering, and tracking ethics training mandated by the Ethics in Government Act and related statutes and regulations. OGC will coordinate its ethics training with OHRM.

(2) Enterprise business training.

(a) This is training that addresses an enterprise goal.

(i) Example: enterprise-wide customer-service training that should be uniform across the agency.

(b) The CLO will assess the needs for, and lead the design and development of, GSA enterprise-wide business training. The OHRM will coordinate decisions about what constitutes enterprise business training with OHRM business partners, and then arrange enterprise-wide solutions.

(3) Business-specific or organization-specific training.

(a) Some training addresses the needs of specific business units or sub-parts of GSA, such as teams or divisions, and is not applicable to most other GSA entities. In these cases, the GSA internal business partners have primary responsibility to self-assess, identify and define training needs specific to themselves, and then work with OHRM to arrange training solutions that meet those needs. The CLO will provide its business partners with a framework for this assessment, assist business partners in the design or acquisition of suitable training, and oversee measuring the effectiveness of this training.

#### **4. GSA ANNUAL LEARNING AND DEVELOPMENT CYCLE**

a. To maximize the strategic value of training expenditures to the agency, OHRM will establish an annual learning and development cycle.

(1) In May, following the completion of mid-year performance reviews:

(a) Each GSA employee shall draft and submit a preliminary Individual Development Plan (IDP), or else an Executive Development Plan (EDP), as appropriate, for the subsequent fiscal year within one calendar month of the mid-year review;

(b) Each GSA supervisor shall prepare a brief training needs-assessment for his or her own work unit within one calendar month of completion of the mid-year reviews, considering the IDPs of employees in that unit;

(c) Organizations shall roll up the needs assessments and prioritize training needs for the coming year, to be used in the budgeting process.

(2) By June 30:

(a) Using data from the needs assessments and IDPs, OHRM and OCFO shall establish target training budgets for the subsequent fiscal year, with input from the GSA Learning and Development Council (LDC).

(3) By July 31:

(a) OHRM shall establish an enterprise learning and development plan for the subsequent fiscal year, establishing the target allocation of training funds;

(b) The LDC shall evaluate new and existing formal leadership development programs and approve the slate of programs open for GSA employee participation for the next fiscal year.

(4) By September 30:



(a) The CLO shall complete and publish an annual measurement of training effectiveness

(5) October to December:

(a) Organizations shall conduct appropriate succession planning exercises;

(b) Each employee shall review and, if appropriate, revise and resubmit his or her IDP for that fiscal year within one calendar month of completion of his or her performance review for the prior fiscal year;

(c) The CLO shall identify mission-critical gaps in training, and develop a plan to address those gaps.

(6) January to March:

(a) OHRM and the LDC shall complete succession planning for the next fiscal year, including identifying a slate of candidates for leadership development.

## **5. MEASURES AND METRICS**

a. As required in 5 C.F.R. § 410.201, GSA organizations must assess and evaluate the agency's training plans and programs.

b. GSA's success in training and employee development can only be determined by establishing clear goals and measuring the effectiveness of the training. Training metrics should be aligned with agency strategic goals and organizational business objectives. The CLO will therefore provide a framework for the development and application of learning and development measures across the agency.

(1) Among other factors, these measures shall assess the return on investment (ROI) and the return on expectations (ROE) the agency receives from each learning and development expenditure. All expenditures shall be evaluated for ROI/ROE.

## **6. INDIVIDUAL DEVELOPMENT PLANS (IDPs) and Executive Development Plans (EDPs)**

a. Applicability.

(1) All GSA employees shall have and maintain an up-to-date IDP or EDP.

(2) This policy shall hereafter use "IDP" to refer to both IDPs and EDPs, except where the policy makes an explicit distinction. Policy for IDPs shall thus apply to GSA senior executives.

b. Purpose of the IDP.

(1) The IDP may contain objectives and action steps related to either or both of the following:

(a) Current-year objectives related to the individual performance plan:

(i) The current-fiscal-year action steps in the IDP comprise a plan to meet the performance goals established by the supervisor in the individual performance plan and discussed during the performance review. The plan addresses gaps in the employee's skills or knowledge in order to increase the employee's ability to meet performance goals in his or her current role.

(b) Future objectives related to the employee's medium- and long-term career development objectives within the agency:

(i) Future objectives establish a long-term vision for the employee's career development by identifying opportunities toward which the employee may wish to work beyond the performance period that advance both the employee's long-term career goals, such as preparation and eligibility for promotions or accepting higher levels of responsibility in the organization, and also the strategic goals of the agency and the employee's division or unit, such as workforce and succession planning needs identified by the agency.

(2) Completing the IDP's short-term action plan should result in an increase in the employee's knowledge, skills, and abilities, in turn maintaining or improving the employee's productivity in some measurable way.

(3) Progress toward achieving IDP objectives may be discussed and evaluated during performance reviews to the extent that it reflects effort or lack thereof by the employee to improve his or her performance in light of the prior performance assessment. The IDP is not itself a performance element. However, supervisors may and should consider IDP progress when discussing and evaluating an employee's effort to improve performance results, especially in light of learning objectives recommended by the supervisor during the prior performance assessment.

c. Drafting the IDP: responsibilities and expectations.

(1) An IDP is a written document developed and/or updated each year by an employee with assistance from his or her supervisor.

(2) Each employee shall draft his or her own IDP based at least in part on learning objectives established or recommended by the supervisor. The supervisor shall help the employee identify training needs and suitable learning and development opportunities to meet those needs. Once the IDP is drafted, the employee shall submit it to the supervisor for review and approval. The IDP must be approved by the employee's

immediate supervisor, or by an appropriate alternative authority in the employee's direct chain of command if the supervisor is unavailable.

(3) The employee and supervisor shall develop the IDP according to the following schedule:

(a) After the formal mid-year performance review, the employee and supervisor shall assess the employee's learning and development needs and draft a development plan for the upcoming fiscal year.

(b) The draft IDPs for that supervisor's team will form the basis for the team's training needs assessment (see Section 1.f. and Section 4 of this policy).

(c) OHRM will evaluate the training needs assessments, provide guidance, and make recommendations to OCFO about training budgets across the agency.

(d) At the beginning of the following fiscal year, and after the supervisor has completed the annual performance appraisal for the prior year, the supervisor and employee will review and revise the IDP in light of the employee's performance and then-current training needs, and the available training budget for that unit, and input and approve the new IDP.

(4) Each employee and his or her direct supervisor shall be jointly accountable for ensuring that the employee has an approved, up-to-date IDP.

(5) During mid-year performance meetings and at any other suitable time, supervisors and employees should discuss progress toward completing the current IDP action plans and whether the current IDP should be amended.

(a) The IDP may be amended at any time, jointly by the supervisor and employee:

(i) To meet organizational needs,

(ii) To take advantage of new development opportunities for the employee that address current or future goals, or

(iii) When funding changes would influence (i.e., enable, interrupt, or prevent) completion of a learning event.

d. Structure and contents of the IDP.

(1) Learning and development opportunities appropriate for inclusion in the IDP include training classes, academic courses, on-the-job training events, mentoring, reading assignments, details, rotational assignments, shadowing opportunities, and any

other learning endeavor that consumes the employee's time and/or imposes a cost to be paid by GSA.

(2) The IDP should:

(a) List specific, measurable objectives for the employee's development, drafted jointly by the supervisor and employee;

(b) Link these development objectives to specific job-related gaps in the employee's skills, knowledge, or abilities;

(c) Explain how the capabilities targeted by the development plan will aid the work unit in achieving its strategic goals;

(d) List individual action items for the employee's learning and development that can be completed within the performance cycle aimed at achieving the stated objectives; and

(e) Identify suitable long-term learning and development goals related to the employee's career development and possible action steps to achieve those goals with a time horizon beyond the performance cycle.

e. Discussion of IDP success between supervisor and employee.

(1) At the time for the employee's annual performance review, the employee and supervisor shall also review progress toward and completion of the goals set forth in the IDP for that review period.

(a) IDP progress is not itself a component of the performance review, but the time for evaluating such progress is at the end of the relevant performance period, by which point the employee should have completed the action steps listed in the IDP.

(b) The employee and supervisor should discuss whether the IDP action plan was realistic, comprehensive, and successful at achieving the IDP learning and development goals.

(i) Factors to consider include: the employee's efforts toward completion of the action plan, matters outside the employee's control that influenced progress, and the level of support and guidance provided by the supervisor.

(2) Each GSA employee is responsible for tracking the completion of his or her own IDP action plan. OHRM will develop and deploy tools to facilitate recording and tracking IDP progress.

f. Funding of and reimbursement for training by the agency: IDP requirement.

(1) No training-related expenditure shall be funded or reimbursed by GSA unless it is included in the employee's approved IDP.

(2) **Approval of an IDP does not guarantee funding for the elements of that IDP.** The agency's strategic goals and budget may change, necessitating deviation from any given IDP. Likewise, uncertainty about funding should not delay drafting and approval of the IDP. The IDP is appropriately viewed as a proposed plan, subject to modification by the drafting parties and the agency, and circumstances affecting them.

(3) IDPs developed for bargaining unit employees must be in accordance with the GSA/AFGE National Agreement and GSA/NFFE National Agreement.

g. SES development plans.

(1) This section reserved.

## **7. ELIGIBILITY FOR GSA LEARNING AND DEVELOPMENT PROGRAMS**

a. All federal employees at GSA are eligible to participate in formal and informal individual and career development opportunities sponsored or provided by GSA unless otherwise excluded by statute, regulation, policy, or program limitation.

b. GSA employees seeking to participate in GSA-sponsored programs:

(1) Must meet GSA employment eligibility and performance requirements for participation in the selected program.

(2) Must meet all program eligibility requirements for participation, including assigned pre-work, experience, or other prerequisites.

(3) Will be selected in accordance with Equal Employment Opportunity, Merit Systems Principles, and GSA-identified processes as prescribed in law, rule, regulation, and GSA policies.

(4) Shall consider the appropriate GSA On-Line University (OLU) E-learning, no-fee Computer Based Training (CBT) program(s), GSA University for People (U for P), or equivalent, before pursuing a fee-based program.

c. Additional eligibility restrictions may apply to some programs, such as time with GSA, performance, grade level, or competitive requirements.

## **8. CONTRACTOR ELIGIBILITY FOR LEARNING AND DEVELOPMENT PROGRAMS**

a. Contractors may only be trained utilizing GSA training for agency specific knowledge or skills they are not expected or unable to bring to the job (such as GSA IT Security Awareness and Privacy Act Training).

b. Contractors may be trained in rules, practices, procedures and/or systems that are unique to GSA.

## **9. PAYMENT OF TRAINING EXPENSES; QUALIFICATION FOR REIMBURSEMENT; TAXES**

a. Each employee bears the responsibility to ensure he or she is eligible and approved to attend training, and that he or she receives reimbursement.

b. GSA may pay for or reimburse employee learning and development expenses in two broad categories:

### **(1) Normal, job-related learning and development.**

(a) Most employee learning and development is directly related to the employee's current role. These activities result in knowledge or skills that the employee usually can apply immediately upon completion. They address gaps in job-related skills, knowledge, and abilities that allow the employee to improve performance or take on additional responsibility related to the role.

(i) Examples include technical skills training or academic course work that is directly related to the current role, project management training for employees who currently lead project teams or are ready to begin doing so, and the like.

### **(2) Career development.**

(a) Some learning and development activities relate to future roles within the organization that the employee may reasonably be expected to pursue given his or her current role. These activities instill knowledge or skills that may take time after the learning activity for the employee to develop and master, and which may prepare the employee to take on roles of increased responsibility in his or her current field.

(i) Examples include leadership development programs, Harvard, and Eisenhower School (Formerly ICAF).

### **(b) Sabbaticals.**

(i) Sabbaticals are granted so that an SES career appointee may engage in study or uncompensated work experience that will contribute to the individual's development and effectiveness. (5 USC §3396).

(ii) A sabbatical may be granted by the GSA Administrator to any GSA SES career appointee who has completed 7 years of service in SES positions, or equivalent civil service positions at least 2 years of which were in the SES. In addition, the appointee cannot be eligible for voluntary retirement with a right to an immediate annuity.

(iii) A sabbatical may not exceed 11 months nor may it result in the loss of, or reduction in, pay, leave to which the career appointee is otherwise entitled, credit for time or service, or performance or efficiency rating.

(iv) The Administrator may authorize travel expenses and per diem allowances if deemed essential for the study or experience.

(v) A sabbatical may not be granted to the same career appointee more than once in any ten-year period.

(vi) Prior to the start of the sabbatical, the appointee must sign an agreement to return to and continue in the civil service for a period of at least 2 consecutive years following the sabbatical. (5 USC §3396(c)(3)(B)). The Administrator may waive this requirement for good and sufficient reasons, such as disability retirement, an agency reduction in force, or other involuntary separation.

(c) Career development programs that are centrally managed by the agency must feature a formal, transparent, competitive nomination process for participation. The LDC shall establish nomination and application procedures for career development programs. OHRM is responsible for administering these programs.

(i) The LDC shall determine whether other programs not on the slate of programs approved for central funding shall nevertheless be available to GSA internal business partners for participation on a non-competitive, ad-hoc basis. The OHRM will advise business partners in identifying and selecting suitable external programs, help assess their success at meeting agency goals, and upon request, aid in evaluating and selecting internal candidates for participation in these programs.

c. Reimbursement requirements and limitations for training and related expenses:

(1) GSA employees shall adhere to Federal Travel Regulations and GSA policy regarding travel and related expenses. GSA may set special restrictions on travel associated with learning and development at its discretion.

(2) GSA may elect to fund, pay or reimburse for a training or development program, but only if:

(a) It is related to the employee's job responsibility or in direct association with the GSA Mission, and

(b) The opportunity is included in the employee's active IDP approved by the employee's direct supervisor or appropriate alternative in the employee's direct chain of command, before the employee undertakes the activity, and

(c) An OPM SF-182, or a functional equivalent, has been submitted and approved for any training that imposes a cost to the agency.

(i) No OPM SF-182 is required for training that does not impose an additional cost to the agency as a result of the employee's participation.

(3) GSA generally will only fund advance payment of expenses such as tuition, per diem, travel, and other expenses essential to an approved program if the employee does not have a travel card.

(4) Agency funds will not be used for personal expenses such as meals and refreshments unless the provision of food is demonstrated to be necessary for the employee(s) to obtain the full benefit of the training program. Two conditions apply:

(a) Meals or refreshments must be incidental to the program.

(b) Attendance at the meal or refreshment break must be necessary for full participation in the program.

(5) Consistent with Federal Travel Regulations and GSA travel policy, GSA may authorize reimbursement of actual subsistence expenses (meals and lodging) up to 300% of the applicable per diem rate to an employee attending a training program if GSA requires all participants to stay in a hotel near the training site to take full advantage of the learning opportunity, and no nearby hotel is available at or below the per diem rate. (FTR 301-11.300, 301-74.22). Per diem expenses are not authorized for employees who are training at their official station.

(6) Funding registration fees: GSA may fund payment of a registration fee for a program sponsored by an interagency board, council, or commission, such as a Federal Executive Board, when the payment directly benefits GSA, and the fee does not include elements designed to capture more than the direct costs of sponsoring the seminar.

(7) Certifications, accreditations, and licenses.

(a) Generally, GSA will not pay for employees to undergo a certification, accreditation, or licensing process such as a certification exam.

(i) Under 5 U.S.C. §5757(a), an agency may pay only the expenses required to obtain or maintain a professional license or professional certification needed to practice a particular profession. For example, the agency may pay for annual licensing fees for GSA attorneys, because those fees are necessary for the attorney to continue to practice at the agency and are a formal requirement of the job.



(ii) Because obtaining certification is generally necessary prior to being hired into a position, reimbursement authorization for a new certification is usually only applicable when position requirements are changed formally on an agency-wide or government-wide basis.

(b) GSA may still pay for job-related training that also happens to prepare employees to obtain credentials. (5 U.S.C. §5757). The employee's IDP should link the training to the job-related goal it will help the employee achieve, without reference to the credential.

(i) For example, if an employee wishes to take classes in preparation for PMP certification because she has project management responsibilities in her current position, the agency may pay for the cost of the training classes (consistent with the other provisions of this section), but may **not** pay any fees associated with the certification exam itself, which is usually a separate expense.

(ii) In rare instances, vendors who provide both training and certification in a field may sometimes provide certification as a part of job-related training and may refuse or be unable to separate the fee for certification from the fee for training. In such cases, the fact that certification is incidental to, and indivisible, from training shall not prevent the agency from paying or reimbursing for that training.

(8) General spending limits for training payment or reimbursement.

(a) The OHRM and the OCFO shall jointly and exclusively determine agency-wide training-related spending limits, if any, based on budget conditions and organizational strategic goals.

(b) Funding of training expense requests depends on then-current budget availability or constraints. Supervisors shall make individual funding decisions based on budget availability, organizational strategic goals, capability gaps identified in unit and division training needs assessments, and properly drafted and approved employee IDPs as outlined in Section 6 of this policy.

(9) Tax implications for employees of training reimbursement.

(a) Training that allows an employee to improve or maintain skills related to the employee's position or duties carries no tax implications for the employee. This governs the vast majority of training payment and reimbursement for GSA employees.

(b) Training that qualifies an employee for a new trade or business unrelated to his or her current position or duties is taxable income to the employee. Such training usually meets industry standard minimum qualifications for a different kind of job, or otherwise allows the employee to enter a field different from the employee's current job, such as training that would allow someone to obtain a license to practice in a new field. It is exceedingly unusual for the agency to pay for this type of training, and such

payment would generally only be undertaken in response to an agency-wide re-prioritization or similar initiative in which the agency chose to remap personnel to different positions or duties.

(i) For example, a contracting officer taking courses to prepare for a career as an architect would be training for a new trade or business unrelated to the employee's current role.

(ii) By contrast, a contracting officer taking management courses in preparation for taking on responsibilities as a team lead or supervisor of contracting officers would be normal, job-related training, with no tax consequences.

(iii) The mere fact that training leads to certification does not mean that it is a new field for the employee. For example, this condition does not apply to a program manager who takes project management training in preparation for PMP certification, because that training improves skills needed for the employee's present job.

(c) The IRS sets a tax-deductibility threshold for academic training that is part of a formal, written, agency-wide educational assistance program, beyond which threshold the employee must pay income tax, and the agency must report the excess on the employee's W-2. For 2014, that threshold is \$5,250. This section applies only to formal, written educational assistance programs open to all or substantially all employees, not favoring highly compensated employees. This IRS provision does not limit the amount the agency may pay or reimburse for training. It merely establishes the amount beyond which further payment by the agency's educational assistance program constitutes taxable income, and only for that specific type of educational assistance. It does not apply to normal, job-related learning and development activities in any way. Employees should consult with their own tax advisor(s) to determine tax implications of reimbursement within this category.

d. GSA Purchase Cards:

(1) Only after the training request, OPM SF 182 or functional equivalent, has been approved, may the cardholder provide the purchase card account number to the training vendor by phone or on the registration form.

(2) Purchase cards must be used consistent with the policies, procedures and guidance provided in the GSA Order, Use of the GSA Purchase Card (CFO 4200.1A), dated August 17, 2009, or as may be amended or superseded over time.

e. Contractor training.

(1) GSA shall not fund contractor training, other than: to train the contractor in rules, practices, procedures, and/or systems required and unique to GSA, without which they would have no access to critical systems or resources.

## **10. MEMBERSHIP IN PROFESSIONAL ASSOCIATIONS**

### **a. Agency memberships.**

(1) GSA may pay for agency memberships to professional associations where membership confers benefits to the agency that advance agency goals or meet identified agency learning and development needs.

### **b. Individual memberships.**

(1) Federal law generally prohibits GSA from paying for or reimbursing the cost of professional association memberships for individual employees. 5 U.S.C. §5946; GAO B-302548.

(a) This prohibition applies regardless of possible benefit to the agency of an employee's individual membership in the voluntary association. For example, even if the individual membership would result in reduced cost of training the employee will otherwise undertake as a non-member, the agency is still prohibited from paying for individual membership. (GAO B-302548).

(b) GSA may pay the cost of individual membership in an association if and only if the membership fee is intrinsic or incidental to, and indivisible from, the cost of an approved training course or program in which an employee participates.

(i) For example, if an employee takes a course offered by an association, and as a part of the tuition for that course, the employee receives a one-year membership in that association, and the association cannot or will not reduce the cost of that course by the price of membership and exclude that benefit, then the agency may still pay for or reimburse the cost of that training.

## **11. OBLIGATIONS FOR PARTICIPATION IN GSA LEARNING AND DEVELOPMENT PROGRAMS**

a. A GSA employee enrolled in a GSA-paid or GSA-sponsored program is expected to complete satisfactorily the training for which they register and attend.

b. A GSA employee who fails to meet requirements for successful completion of the program or course shall be obligated to repay GSA for tuition and books, and other expenses connected with the course.

c. For university, college, professional certification prep, or other approved and accredited courses, successful completion or "passing" is understood to mean:

(1) A minimum grade of "C" for an undergraduate course.

(2) A minimum grade of "B" for graduate-level courses.

(3) "Pass" in a pass/fail course.

(4) The minimum passing score established by the professional accreditation board or training delivery organization for the intended course, or program of study.

d. GSA Continuing Service Agreement (CSA); expected return on investment:

(1) An employee selected for training requiring 80 hours or more to complete, or costing \$3,000.00 or more inclusive of all related expenses, agrees to continue in the service of GSA or elsewhere in the Federal Government after the end of the training period for a work period at least equal to ten (10) times the length, in hours, of the training period (usually the total classroom hours), unless he or she is involuntarily separated from the Federal Government. For example, an employee attending a 80-hour-long (e.g., 2 week) course agrees to remain employed by the Federal Government for not less than 800 working hours (80 hours x 10 = 800 hours / 8 hour-day = 100 working days, or 20 weeks) after course completion.

(2) In the event that an employee voluntarily separates from the Federal Government within the period covered by the continuing service agreement, the employee shall repay the amount the Government paid for that training, plus any related expenses. The amount due shall be pro-rated according to the service agreement schedule. For example, if the employee completes only 50 days of a 100-day continuing service agreement, the employee shall repay half the total amount paid by the Government in connection with that training.

(3) Repayment within the period covered by the continuing service agreement is not required of an employee who leaves the service of his or her agency to enter into the service of another agency in any branch of the Federal Government.

(4) Senior executives accepting a sabbatical must agree to serve in the civil service upon completion of the sabbatical for a period of two (2) consecutive years. If the career appointee fails to meet this agreement (except for sufficient reason as determined by the Administrator), the appointee shall be liable to the United States for all expenses, including salary, paid by the Government to or on behalf of the employee during the sabbatical.

(5) Authority is delegated to the GSA Chief Human Capital Officer (CHCO) to approve a written waiver, in whole or in part, of a right of recovery under this section, if it is shown that the recovery would be against equity, good conscience or against the public interest.

e. Exceptions to requirements.

(1) Exceptions to service requirements or other obligations established in this section may be made under extraordinary circumstances (such as a death in the family requiring an employee to leave a training early). Exceptions must be approved and

signed by the GSA Chief Human Capital Officer, and must be requested in writing accompanied by documentation or other evidence detailing the extraordinary circumstances that justify the request.

## **12. CAREER TRANSITIONAL ASSISTANCE**

a. OHRM will develop a Career Transitional Assistance Program (CTAP) consistent with the provisions of 5 U.S.C. §330.601-711 to provide policy and procedures for retraining of surplus and displaced employees in the event of a reduction in force. The GSA CTAP shall be issued as separate policy and procedure that identifies the agency's selection priority policies, the types of services the agency will provide or allow, absence policies, internal and external placement policies, and reemployment policies.

## **13. EDUCATIONAL ASSISTANCE PROGRAMS (TUITION ASSISTANCE)**

a. Consistent with the provisions of 5 U.S.C. §4107, GSA does not pay for or reimburse employees for the cost of academic degree coursework, unless such coursework contributes significantly to:

- (1) Meeting an identified agency training need;
- (2) Resolving an identified agency staffing problem; or
- (3) Accomplishing goals in the agency's strategic plan.

b. Tuition assistance is not offered by GSA on an ad-hoc basis. Such assistance must be part of a formal, planned, systemic, and coordinated agency employee development program, approved by OHRM, linked to accomplishing strategic goals and administered in a manner consistent with Merit System Principles set forth in 5 U.S.C. §2301(b), paragraphs (2) and (7), and 5 U.S.C. 7201(b).

(1) GSA organizations must establish policy and procedures for an academic degree training program that is part of a planned, competitive, and coordinated employee development program linked to accomplishing GSA's strategic goals.

(2) The training must be accredited and provided by a college or university that is accredited by a regional, national, or international accrediting organization recognized by the U.S. Department of Education.

(3) Academic training must be directly related to the employee's current or planned official duties and must not be for the sole purpose of:

- (a) Providing an employee the opportunity to obtain an academic degree, or

(b) Enabling the employee to qualify for appointment to a particular position for which the academic degree is a basic requirement.

(4) Supervisors may adjust the employee's customary workweek to allow an employee to take courses not sponsored by the agency, if additional costs to GSA will not be incurred.

c. Federal law requires that online options for academic training must be considered and used to the greatest extent practicable. (5 U.S.C. §4107(b)(4)).

d. An employee (as defined in 5 U.S.C. §4101(2)), is eligible for consideration for appropriate academic programs, except those employees occupying or seeking to qualify for:

(1) Appointment to any position that is exempt from the competitive services because of its confidential, policy-determining, policy-making , or policy advocating nature (i.e., Schedule C appointments); or

(2) A non-career appointment in the Senior Executive Service.

e. Academic training that is part of a degree program is subject to the GSA Continuing Service Agreement (CSA) requirement (see part 11.d(1) of this policy).

(1) Exceptions to service requirements in this section may be made under extraordinary circumstances or if the employee leaving GSA will enter employment with another federal agency. Exceptions must be approved and signed by the GSA Chief Human Capital Officer, and must be requested in writing accompanied by documentation or other evidence detailing the circumstances that justify the request. No exceptions can be made to statutory requirements.

## **14. CONFERENCES**

a. Conferences the primary function of which is not to provide employee-specific training are outside the scope of this policy. Generally, attendance at conferences with the primary purpose of expanding or advancing the services of GSA is subject to approval by the HSSO, RA, and the Chief Administrative Services Officer before any procurement activity takes place or cost is incurred by the GSA organization sponsoring the event. Consult guidance and policy established by the GSA Office of Administrative Services for policy governing conference attendance.

## **15. MINIMIZING TRAINING COSTS; AVOIDING REDUNDANCY**

a. Every effort shall be made to minimize training costs and to avoid duplication of effort across the agency while meeting training needs.

b. Primary sources for training at GSA are existing GSA training programs, GSA On-Line University (OLU), and GSA University for People (U for P). If and only if these sources lack the training necessary to meet a training need, GSA employees may consult existing contracts and BPAs under which training has already been arranged. GSA U for P is also a vehicle for obtaining training within a number of existing arrangements. In developing or arranging for training, these sources shall be consulted and used first, prior to designing and/or contracting for new training regimens.

c. In the interest of sustainability, GSA managers and employees should consider e-learning courses and resources as a first choice for learning and development, if such courses meet the needs of the organization. For information regarding OLU and course registration, utilize the following link: <https://gsaolu.gsa.gov/>.

## **16. TRAINING REPORTS AND RECORD KEEPING**

a. OHRM will identify, manage, maintain and secure the technology required to support GSA learning and development requirements, including recordation in and retrieval of training information from a training database as required by the Office of Personnel Management (OPM).

b. OHRM will manage the technical application and interface required to enable GSA's Learning Management System to transfer training data to the human resources information system.

## Appendix A. Definitions

- Ability. The capacity to do something or perform successfully. A high degree of acquired skill, competency, or talent can be easily transferred to new situations. Ability is an important component of competency development and improved competence. Ability may be observed over time in consistency in areas such as learning (new things, new ways of doing something), performance (doing the same thing better, more efficiently, in improved ways; relating current ways, and procedures to new situations).
- Academic training. A course or program offered by or through an accredited institution of higher learning that increases knowledge, expertise, and skill in focused subject areas.
- Attitude. A personal view of something; an opinion or general feeling about something; a physical posture, either conscious or unconscious (body-language), especially while interacting with others. Attitude is difficult to measure/assess reliably without validated instruments. There are instruments offered in the market place that can provide insight into an individual's propensity to view certain situations, options, or opportunities in a particular way.
- Behavior. Observable activity; the way in which a person or group responds to a certain set of conditions in the workplace.
- Business partner. A customer or consumer of OHRM services within GSA.
- Certificate. Recognition of accomplishment - provided to individuals who have completed a predetermined course of study set by an agency of government, industry, or a profession. A certificate program does not typically include the use of comprehensive testing and carries no legal implications or inferences about ability e.g., a Certificate of Completion.
- Certification. Recognition provided to individuals who have met predetermined qualifications set by an agency of government, industry, or a profession. Certifications typically require highly specialized testing e.g., the bar exam, the CPA exam and carry with them legal implications as to a holders abilities and liability. Examples include a Certified Public Accountant (CPA), American Institute of Professional Architects (AIPA), trade licenses required for certain trade occupations.
- Competency. A single set/combination of knowledge, skills, experiences, attitudes, abilities, capabilities, attributes, and behaviors, sufficiently developed and applied to meet the criteria for success in a particular (work) context e.g., job, group of jobs, functions.



- Competency assessment. The process of assessing or measuring an individual's competence in terms of a specified job, task or behavior.
- Conference. A symposium, seminar, workshop, or other organized or formal meeting lasting portions of one or more days, where people assemble to exchange information and views or explore or clarify a defined subject, problem or area of knowledge.
- Core competency. The most critical competencies in a job/role that make up job competence. There are traditionally 3-5 competencies that have greater impact on a business than all the others.
- Individual Development Plan (IDP). A written document developed by an Employee with the support of his/her supervisor outlining learning and developmental activities to help the Employee to perform more effectively in his or her current position. It typically covers a one-year period in detail, and may include long-term goals.
- Knowledge. Information a person has in a specific content area; general awareness or possession of information, facts, ideas, truths, or principles. Familiarity or understanding gained through observation, experience or study. In terms of assessment you can observe/assess knowledge.
- Position. The formal function into which the employee was hired or classified, as defined in the employee's position description, and recorded in the employee's human resources records such as the SF-50.
- Professional credentials. Professional credentials include licenses, certificates, or other accreditation.
- Role. The part or function an employee actually performs in the organization, based on the mutual understanding of the employee and supervisor. Derives from the employee's position (see above), but usually develops based on the employee's strengths and weaknesses, and the agency's strategic and tactical needs. Defined principally by the employee's current individual performance plan.
- Sabbaticals are extended leaves of absence the agency may grant to a career appointee to allow study or uncompensated work that will contribute to the individual's development and effectiveness.
- Self-development. The process of growth through self planned activities that increase the employee's competence. These efforts are primarily paid for and undertaken by employees on their own time to become more proficient in their career field or better qualified for advancement in a new field.

- Skill. The ability to do something well, usually gained through experience and repeated practice. Skill behaviors are observed, assessed and or measured in terms of speed, precision, replication, procedures, or techniques in execution to a prescribed level of performance.
- Training. A program of learning experiences designed to improve job performance through achievement of specific learning objectives.

## Appendix B. References

- 5 U.S.C. §4103<sup>i</sup> requires that training programs be established to increase economy and efficiency in the Federal Government and to raise the standards of employees' performance of their official duties to the maximum possible level of proficiency. 5 U.S.C. Chapter 41 authorizes training in Government and non-government facilities and the acceptance of funds by employees for training from certain non-Government organizations.
- 5 U.S.C. §4107<sup>ii</sup> governs agency payment for academic degree training.

**CONTACT:** Questions concerning this Policy and Procedure may be delivered to the Office of Human Resource Management, Office of Human Capital Management, Talent Development Center of Expertise (CHT).

---

### <sup>i</sup> §4103. Establishment of training programs

(a) In order to assist in achieving an agency's mission and performance goals by improving employee and organizational performance, the head of each agency, in conformity with this chapter, shall establish, operate, maintain, and evaluate a program or programs, and a plan or plans thereunder, for the training of employees in or under the agency by, in, and through Government facilities and non-Government facilities. Each program, and plan thereunder, shall—

- (1) conform to the principles, standards, and related requirements contained in the regulations prescribed under section 4118 of this title;
- (2) provide for adequate administrative control by appropriate authority;
- (3) provide that information concerning the selection and assignment of employees for training and the applicable training limitations and restrictions be made available to employees of the agency; and
- (4) provide for the encouragement of self-training by employees by means of appropriate recognition of resultant increases in proficiency, skill, and capacity.

Two or more agencies jointly may operate under a training program.

(b)(1) Notwithstanding any other provision of this chapter, an agency may train any employee of the agency to prepare the employee for placement in another agency if the head of the agency determines that such training would be in the interests of the Government.

(2) In selecting an employee for training under this subsection, the head of the agency shall consider—

- (A) the extent to which the current skills, knowledge, and abilities of the employee may be utilized in the new position;
- (B) the employee's capability to learn skills and acquire knowledge and abilities needed in the new position; and
- (C) the benefits to the Government which would result from such training.

(c) The head of each agency shall, on a regular basis—

- (1) evaluate each program or plan established, operated, or maintained under subsection (a) with respect to accomplishing specific performance plans and strategic goals in performing the agency mission; and
- (2) modify such program or plan as needed to accomplish such plans and goals.

### <sup>ii</sup> §4107. Academic degree training

---

(a) Subject to subsection (b), an agency may select and assign an employee to academic degree training and may pay or reimburse the costs of academic degree training from appropriated or other available funds if such training—

(1) contributes significantly to—

(A) meeting an identified agency training need;

(B) resolving an identified agency staffing problem; or

(C) accomplishing goals in the strategic plan of the agency;

(2) is part of a planned, systemic, and coordinated agency employee development program linked to accomplishing the strategic goals of the agency; and

(3) is accredited and is provided by a college or university that is accredited by a nationally recognized body.

(b) In exercising authority under subsection (a), an agency shall—

(1) consistent with the merit system principles set forth in paragraphs (2) and (7) of section 2301(b), take into consideration the need to—

(A) maintain a balanced workforce in which women, members of racial and ethnic minority groups, and persons with disabilities are appropriately represented in Government service; and

(B) provide employees effective education and training to improve organizational and individual performance;

(2) assure that the training is not for the sole purpose of providing an employee an opportunity to obtain an academic degree or qualify for appointment to a particular position for which the academic degree is a basic requirement;

(3) assure that no authority under this subsection is exercised on behalf of any employee occupying or seeking to qualify for—

(A) a noncareer appointment in the senior Executive Service; or

(B) appointment to any position that is excepted from the competitive service because of its confidential policy-determining, policy-making or policy-advocating character; and

(4) to the greatest extent practicable, facilitate the use of online degree training.